

UNITED STATES DISTRICT COURT

for the
District of Delaware

United States of America

v.

JACOB SANTIAGO

Case No.

21-343M

Defendant(s)

CRIMINAL COMPLAINT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of October 1 - December 9, 2021 in the county of New Castle in the
 District of Delaware, the defendant(s) violated:*Code Section**Offense Description*21 U.S.C. Section 846, 841(a)(1),
(b)(1)(C)

Conspiracy to distribute methamphetamine and heroin

This criminal complaint is based on these facts:

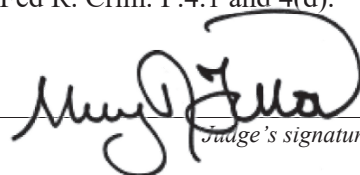
See attached affidavit

☒ Continued on the attached sheet.*Complainant's signature*

Special Agent Jerwon Bethel, DEA

Printed name and title

Sworn to before me over the telephone and signed by me pursuant to Fed R. Crim. P.4.1 and 4(d).

Date: 12/13/2021*Judge's signature*City and state: Wilmington, Delaware

Hon. Sherry R. Fallon, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Special Agent Jerwon Bethel, of the Drug Enforcement Administration being first duly sworn, hereby depose and state as follows:

1. I am a “federal law enforcement officer” within the meaning of Federal Rule of Criminal Procedure 41(a)(2)(C), that is, a government agent engaged in enforcing the criminal laws and duly authorized by the Attorney General to request a search warrant.

2. I have been a Special Agent of the United States Drug Enforcement Administration (“DEA”) since September 2019 and am currently assigned to the Wilmington Resident Office Task Force Group 35 located in Wilmington, Delaware. Prior to my employment with DEA, I was employed by the Anne Arundel County Police Department as a Police Officer from September 2013 to September 2019. During my career with Anne Arundel County Police Department, I was promoted to the rank of Corporal, where I focused on patrol and street level drug cases as well as narcotics investigations.

3. As part of my employment with the DEA, I successfully completed DEA basic agent training in Quantico, Virginia, an intensive eighteen-week course covering all aspects of drug enforcement, including electronic surveillance.

4. During the course of my law enforcement career, I have participated in numerous investigations of illicit drug trafficking organizations involving the use of confidential informants, electronic and physical surveillance, the analysis of telephone toll records, investigative interviews, and the service of search and arrest warrants. These investigations include the unlawful importation, possession with intent to distribute, and distribution of controlled substances, as well as laundering monetary instruments, conducting monetary transactions involving the proceeds of

specified unlawful activities, and conspiracies associated with criminal controlled substances offenses.

5. During my law enforcement career, I have written and/or executed several search and seizure warrants related to various types of evidence including illegal drugs, drug paraphernalia, drug records, and drug proceeds. I have written arrest warrants for and conducted arrests of individuals involved in drug trafficking activities.

6. During my career I have become familiar with the patterns of activity of drug traffickers including the methods, language, and terms that are used to discuss illegal drug dealing. I am familiar with how controlled substances are obtained, diluted, packaged, distributed, sold and used within the framework of drug trafficking and how drug traffickers utilize wire communications to facilitate their illegal activities. I have become familiar with the manner in which illegal drugs are transported, stored, and distributed, and the methods of payment for such drugs. I have conducted surveillance of drug traffickers and have observed them interact with their suppliers, criminal associates, and customers. I have conducted interviews of informants and/or defendants including drug users, street-level dealers, and upper-level distributors.

7. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

8. This Affidavit is support of a criminal complaint against Malik MOSS a/k/a "Bleek," Jacob SANTIAGO, Gerardo Rodriguez a/k/a "Snapper," and Christina CHAMBERLAIN. This Affidavit is based on my personal knowledge and observations as well as information provided to me by other law enforcement officers. Because this Affidavit is solely

for the purpose of establishing probable cause, I have not included each and every fact known to me concerning this investigation. I have not, however, excluded any information known to me that would defeat a determination of probable cause.

9. Pursuant to Title 21, United States Code, Sections, 841(a)(1), (b)(1)(C), and 846 it is unlawful to conspire to distribute a controlled substance, namely heroin and methamphetamine.

10. As laid out in this affidavit, from at least October 1, 2021 to December 9, 2021, MOSS was involved in a conspiracy to distribute heroin and crystal methamphetamine in the Delaware area. This conspiracy involved several other people, including people who were residents of and/or distributors of heroin and/or Methamphetamine within Delaware.

A. Malik MOSS and the MOSS Drug Trafficking Organization

11. This investigation began in June 2021 based upon information received from three confidential sources (“CSs”), known as CS-1, CS-2, and CS-3, and a cooperating defendant (“CD-1”), who identified MOSS as a heroin and/or methamphetamine dealer in the Newark, DE area. During this investigation, CS-1 and CS-2 have conducted five controlled purchases¹ of drugs,

¹ A “controlled purchase” is a purchase of illegal drugs that is characterized as follows: law enforcement gives specific directions to a confidential source; law enforcement searches the confidential source prior to him/her meeting with the suspect(s) to obtain a controlled substance to ensure that the confidential source does not possess any controlled substances or other contraband; pre-recorded currency is provided to the confidential source to purchase the controlled substance; surveillance of the confidential source is maintained before and after the meeting with the suspect(s) to obtain the controlled substance to the extent possible; arrangements are made by law enforcement to meet the confidential source at a specified location following the meeting with the suspect(s); law enforcement retrieves any suspected controlled substance from the confidential source that was obtained from the suspect(s); and law enforcement searches the confidential source to ensure that he/she did not possess any additional controlled substances or other contraband. These protocols were observed each of the controlled purchases referenced herein.

crystal methamphetamine and heroin,² directly from MOSS. Each controlled purchase was coordinated with MOSS while MOSS used his cellular telephone. Through the course of the investigation, law enforcement was able to identify several co-conspirators and the location of suspected stash houses used by MOSS.

12. On September 28, 2021, Chief Judge Colm F. Connolly granted the DEA authorization to intercept wire and electronic communications over MOSS's current cellular telephone with number 856-271-1632. This authorization was extended by Chief Judge Colm F. Connolly on October 29, 2021 and November 23, 2021. SANTIAGO, RODRIGUEZ, and CHAMBERLAIN are each listed as Target Subjects in that matter.

13. Conversations intercepted over MOSS's telephone also indicate that MOSS has purchased, and is attempting to purchase large quantities of heroin and crystal methamphetamine for distribution in Delaware and that he has worked with SANTIAGO, RODRIGUEZ, and CHAMBERLAIN and others in furtherance of the TARGET OFFENSES. It has also been indicated through calls, texts, and surveillance that each person works together with MOSS and have an individual role within the organization to help further the DTO.

14. MOSS consistently speaks over voice calls and text messages with SANTIAGO, RODRIGUEZ, and CHAMBERLAIN about the sale of controlled substances, as well as other conduct relating to the TARGET OFFENSES, including the purchase of bulk quantities of controlled substances for subsequent resale. MOSS has a large clientele of individuals who contact him on the TARGET TELEPHONE to purchase these drugs, which with the help of SANTIAGO, RODRIGUEZ, and CHAMBERLAIN he is able to run his drug trafficking organization. MOSS is

² The suspected heroin purchased from MOSS field-tested positive for heroin. The crystal methamphetamine from one of the controlled purchases was chemically analyzed at the DEA laboratory and returned a result of 94% pure methamphetamine +/- 6%.

using at least three separate locations to conceal his products, which include his residence (19 Kullen Drive, Newark, DE), hereafter 19 Kullen; the apartment of CHAMBERLAIN at the Elms Apartments, 1305 Coventry Lane, Newark, DE (the “Elms Apartments”) hereafter, 1305 Coventry; and a residence at 201 Bluefield Road in Newark, Delaware. A majority of the time, MOSS directs customers to the Elms Apartments to meet with CHAMBERLAIN who completes the transactions on his behalf.

15. On other occasions MOSS meets the customer directly to conduct the transaction, often being driven by or accompanied by SANTIAGO. SANTIAGO has also driven MOSS to Reading, PA where it was confirmed through voice calls that MOSS and SANTIAGO purchased 10 lbs of Methamphetamine from SANTIAGO’s Source of Supply. After receiving their product, both MOSS and SANTIAGO stored their Methamphetamine with CHAMBERLAIN at her residence. RODRIGUEZ has a source of supply in Philadelphia for heroin and RODRIGUEZ and MOSS have physically driven there together to receive heroin.

B. Christina CHAMBERLAIN being directed by MOSS and SANTIAGO to facilitate drug transactions

16. MOSS gives CHAMBERLAIN clear directions about facilitating drug transactions. For example, on October 8, 2021 at 6:59 p.m. MOSS exchanged text messages as part of a conversation with CHAMBERLAIN at (302) 307-6742. The pertinent portion of that conversation follows:

CHAMBERLAIN:	Hey you.
MOSS:	Yo girl.
CHAMBERLAIN:	Jake didn’t tell me how much I’m supposed to get from cj for what he dropped off to me.
CHAMBERLAIN:	He still ain’t come yet but I wanna know so I can make sure everything’s right. I mean I’m sure it will be but I wanna make sure that’s all.
MOSS:	250 nd Alana bf comin give him 4 bs he giving u 320
MOSS:	Please bean.

CHAMBERLAIN: How long im about to walk to the store real quick.
MOSS: He there now
MOSS: Open door
MOSS: Bean my ppl's there hit her.

17. Based on my training and experience, CHAMBERLAIN and MOSS are discussing drug transactions for heroin. The term “b” refers to a bundle of heroin, which is 13 bags typically secured together by a rubber band. CHAMBERLAIN references “Jake,” referring to Jacob SANTIAGO, a TARGET SUBJECT, and a transaction that he arranged with “CJ” (“Jake didn’t tell me how much I’m supposed to get from cj for what he dropped off to me.”). MOSS tells CHAMBERLAIN that “CJ” owes \$250 and that another individual, “Alana’s” boyfriend, is also stopping by and CHAMBERLAIN should collect \$320 from them in exchange for 4 bundles of heroin (“4 bs”). MOSS tells CHAMBERLAIN that his customers (“ppls”) are at the door and to let them in. This conversation indicates that both MOSS and SANTIAGO use CHAMBERLAIN to broker drug transactions on their behalf at the Elms Apartments.

18. MOSS frequently directs his customers to CHAMBERLAIN’s apartment, which is on the third floor on the left of Building 1300 in the Elms apartment complex. A small sample of the communications MOSS has had with drug customers about coming to CHAMBERLAIN’s apartment follows:

- Oct. 6, 2021: MOSS: “1300 3rd floor left”
- Oct. 10, 2021: MOSS: “U can come ... elms now 1300 building 3rd floor left”;
- November 18, 2021: Moss: “Ahh can you come to the Elms?”
- December 3, 2021: Moss: “1300 Coventry Lane Newark de”

19. October 31, 2021, at approximately 1:12 p.m., MOSS, placed a telephone call to CHAMBERLAIN which is as follows:

CHAMBERLAIN: Hello
MOSS: Hello
CHAMBERLAIN: Yo
MOSS: What you doing?

CHAMBERLAIN: Nothing
 MOSS: Can you, can you tell Jake to bring me a ounce down, tell him it gotta be chunky though
 CHAMBERLAIN: Yes
 MOSS: Cause [U/I] place
 CHAMBERLAIN: Alright
 MOSS: Thank you
 CHAMBERLAIN: [Aside: Yo]

20. Based on training and experience, your affiant believes MOSS directs CHAMBERLAIN, who is at her apartment at 1305 Coventry, to ask “Jake” (SANTIAGO, who is referred to as “Jake” or “Jacob”) to bring him down an ounce. MOSS then specifies that the ounce needs to be “chunky” (referring to the appearance of crystal methamphetamine being in large chunks as opposed to smaller crushed granules, also known as “shake”). After CHAMBERLAIN affirms, she is heard saying “Yo” to another individual, potentially SANTIAGO. Based on this discussion, and MOSS’s statement “tell him it gotta be chunky,” your affiant believes that SANTIAGO is aware that he needs to bring MOSS higher quality crystal methamphetamine.

21. Additional conversations indicate that MOSS also sells crystal methamphetamine out of 1305 Coventry with CHAMBERLAIN. For example, on November 3, 2021, Moss had a conversation via text message with an unidentified caller (“UNK9717”):

UNK9717: Any ice cream?
 MOSS: Yea elms how much
 UNK9717: Game
 MOSS: ok come on
 UNK9717: well I’m drunk it’s my day off. Where I gotta go?
 MOSS: Elms 1300 Coventry lane
 MOSS: How long
 UNK9717: 21 mins. I need to stop at atm
 MOSS: Ok
 UNK9717: GPS says 20 n I gotta stop at Mac
 MOSS: Okay
 UNK9717: We taking 3,5 for buck
 MOSS: Come on

MOSS: Call me
 UNK9717: 6 mins away
 MOSS: Ok
 UNK9717: Think I'm here
 UNK9717: Yup
 MOSS: Here I come baby
 UNK9717: Tan Infiniti
 MOSS: Come in the building upstairs

22. Based on my training and experience, your affiant believes that UNK9791 asks MOSS if he has any "ice cream" which is a term referring to crystal methamphetamine. MOSS responds by telling the UF "yea" and gives the location by stating "Elms," which based on this investigation I know to be a reference to 1305 Coventry Lane, which is located in the Elms apartment complex. When MOSS asks "how much," UNK9717 responds "game," which refers to an "eight ball" or "ball game," meaning 1/8 of an ounce of a controlled substance. MOSS later gives the address of 1300 Coventry Lane, the address of CHAMBERLAIN and after UNK9717 arrives at the location, MOSS directs UNK9791 upstairs in the building.

23. On November 4, 2021, at approximately 2:01 p.m., MOSS spoke with CHAMBERLAIN via text message about a drug transaction facilitated by MOSS for CHAMBERLAIN to complete. The conversation is as follows:

MOSS: Bean can u make a ball out of that one jawn ND becareful
 wit drag there bc u no how he play baby
 CHAMBERLAIN: I'm trying to get him out of here
 MOSS: His boy comin 2 pick him up now
 CHAMBERLAIN: Oh ok cool
 CHAMBERLAIN: Finally got all them out the damn house. Drag is a weirdo
 CHAMBERLAIN: I should beat on you for leaving me here with him for hrs
 MOSS: Sorry

24. Based on training and experience, your affiant believes that MOSS is directing CHAMBERLAIN ("Bean," MOSS's nickname for CHAMBERLAIN) to sell "Drag" (the customer) a "ball" (approximately 3.5 grams or 1/8 of an ounce is considered a "ball" or "eight

ball”) of a controlled substance from her residence. MOSS directs CHAMBERLAIN to take this amount “out of that one jaw” (from a larger quantity of drugs that is already present) and “make” (weigh out) the quantity he is selling to “Drag.” The conversation also clearly indicates that MOSS is not present for this drug transaction and CHAMBERLAIN is conducting it based on MOSS’s pre-existing agreement with “Drag” and MOSS’s instructions to CHAMBERLAIN. CHAMBERLAIN tells MOSS that he has left “Drag” with CHAMBERLAIN “for hrs” (referring to “hours”).

25. On November 14, 2021 at approximately 2:32 p.m., MOSS exchanged text messages with CHAMBERLAIN about a customer he directed to her and the amount of drugs, in this case heroin, that is left at this location. The details of the text conversation are as follows:

CHAMBERLAIN:	Hey just checking in. You cool?
MOSS:	Yea my ppl's comin that way
CHAMBERLAIN:	For? Bags
CHAMBERLAIN:	What you want me to do when these are gone?
MOSS:	How many bs u got left
MOSS:	ND I told u one of them sticks in that bag was ours
CHAMBERLAIN:	That's right my bad
MOSS:	How many left bean
CHAMBERLAIN:	4 and some singles I got bread here for you
MOSS:	Ok I'll b there soon
CHAMBERLAIN:	Ok

26. Based on training and experience, your affiant believes that MOSS is telling CHAMBERLAIN that he has customers coming to see her. CHAMBERLAIN then asks MOSS what she is supposed to give them (“For?”) and then ultimately indicates that they are almost out of product, when asking what to do “when these are gone.” In response, MOSS asks CHAMBERLAIN how many “bs” (bundles) are left and then references a “stick” (a “stick” or a “log” typically 10 bundles of heroin sold together) belonging to them. CHAMBERLAIN then tells MOSS there are “4” and some “singles” (4 bundles and single bags of heroin).

CHAMBERLAIN also tells MOSS she has “bread” (money) for him, referring to drug proceeds she has collected. Based on this conversation, it appears that both drugs and drug proceeds are stored at CHAMBERLAIN’S residence.

27. I also believe that CHAMBERLAIN engages in her own heroin sales with the drug stash she supervises for the MOSS DTO. For example, on November 28, 2021 at approximately 2:27 p.m., CHAMBERLAIN sent the following text message to MOSS: “We made a couple sales for you with our people today[.]” In your affiant’s training and experience, this text message relates to the sale of drugs. CHAMBERLAIN’s reference of the sales being “for you” (meaning on MOSS’s behalf with his drugs) and “with our people” (meaning customers of CHAMBERLAIN’s).

28. On December 3, 2021 from approximately 9:21 a.m. through 11:09 a.m., MOSS engaged in a text message conversation with a customer known as “Nicole” regarding the purchase of crystal methamphetamine from MOSS through CHAMBERLAIN. The relevant portion of the text conversation between Nicole and MOSS was as follows:.

NICOLE:	hey it’s Nicole I need a ball and I’ll be at Heather’s are you around
MOSS:	Goto tinas
NICOLE:	are u there already
MOSS:	No but its there
NICOLE:	hey I gotta question. im not trying to sound like a rude bitch but could I get pieces instead of shake. PLEASE
MOSS:	That’s all that’s left
NICOLE:	ur killing me B...LoL
MOSS:	Srry
NICOLE:	I’m here... I don’t got her number. does she know I’m coming, should I just go up there
MOSS:	Yea but it’s only shake
NICOLE:	I’ll take shake this time..LoL[.] but she’s gonna have it on the scale for me to see like u do, right?
MOSS:	Yea

29. I am aware that while MOSS was sending text messages back and forth with Nicole, he sent the following text message to CHAMBERLAIN: “I got somebody coming for ball[.]” CHAMBERLAIN responded by saying “It just popped in my head did you do your appointment for the weed card on Wed.? And okay.” Based on training and experience, your affiant believes that this conversation that MOSS had with Nicole was about the purchase of an “eight ball” or 1/8 of an ounce of crystal methamphetamine. When Nicole asked for “pieces instead of shake,” your affiant is aware that a reference to “shake” refers to the tiny granules of crystal methamphetamine that typically exist at the bottom of a container of crystal methamphetamine after all of the large pieces have been sold. Nicole was seeking full pieces of crystal methamphetamine instead of “shake” but MOSS told her that all he had left was the “shake.” MOSS sent Nicole to CHAMBERLAIN (“Goto tinas”) to complete the deal. Despite only having “shake” left, Nicole nevertheless agreed to the deal and asked MOSS if “she” (meaning CHAMBERLAIN) would “have it on the scale” (to confirm it was a full 1/8 of an ounce). MOSS responded “yea,” indicating that CHAMBERLAIN would weigh the drugs out for her.

30. On December 9, 2021, MOSS similarly facilitated a drug transaction and then coordinated with CHAMBERLAIN to perform the transaction on his behalf. Beginning at 3:19 p.m., an unidentified female who goes by the name “Katie” texted MOSS about buying drugs. The relevant portion of the conversation is as follows:

NICOLE:	U got a gram of soft and 8ball of cream
MOSS:	Yea
MOSS:	Elms
NICOLE:	How much
MOSS:	150
NICOLE:	And a B I’m onw
MOSS:	Ok
MOSS:	I’m not there but she there baby
MOSS:	So how much u giving her all together
NICOLE:	How much r these B’s

MOSS: Jus give me 80
 NICOLE: So 230

31. Based on my training and experience, I know that “Nicole” ordered 1/8 of an ounce of crystal methamphetamine (“8ball of cream”) from MOSS as well as one gram of powder cocaine (“a gram of soft”) after confirming that MOSS had those drugs available. They agreed on a price of \$150. However, “Nicole” then sought to also add a bundle of heroin (“And a B”). MOSS then wanted to confirm pricing since “Nicole” added on a bundle of heroin, so “Nicole” asked MOSS “How much r these B’s?” When MOSS said he would charge her \$80 for it, “Nicole” responded “So 230,” meaning \$230--\$150 for the crystal methamphetamine and cocaine, plus an additional \$80 for the bundle of heroin. After being alerted that “Nicole” wanted methamphetamine, cocaine, and heroin, MOSS texted CHAMBERLAIN the following: “Bean I need a ball of ice cream ND a gram of soft ND a B please.” Shortly thereafter, CHAMBERLAIN responded “Ok you have to come bag after this,” meaning that they were running low on baggies of heroin and MOSS would need to bag loose heroin into baggies for resale. MOSS responded to CHAMBERLAIN “She giving u \$230 ok I gotchu,” meaning that CHAMBERLAIN should collect \$230 for the drugs MOSS told CHAMBERLAIN to prepare and that he would subsequently come bag more heroin for resale.³

32. Based on the information above, there is probable cause to believe that CHAMBERLAIN is an integral member of the MOSS DTO and spends the majority of her time working and potentially living at 1305 Coventry. There is also probable cause to believe that

³ “Nicole” subsequently texted MOSS and decided she no longer wanted the bundle of heroin in addition to the other drugs. After being informed of that by “Nicole,” MOSS texted CHAMBERLAIN “150” to let her know that she would only need to collect \$150 from “Nicole” now.

CHAMBERLAIN supervises the “stash house” at her apartment at 1305 Coventry, is in charge of preparing drug orders for sale and collecting and storing those drug proceeds for the MOSS DTO.

C. Jacob SANTIAGO working side by side with MOSS to further the DTO

33. Both MOSS and SANTIAGO are believed to store drugs at 1305 Coventry under the care and supervision of CHAMBERLAIN.

34. On October 2, 2021, at approximately 6:14 p.m., MOSS sent a text message to SANTIAGO asking “Bro were u put the shits at teen bean.” Your affiant knows that CHAMBERLAIN goes by the names “Bean” and “Tina.” Therefore, your affiant believes that MOSS is asking SANTIAGO where he stored the drug stash (“shits”) in CHAMBERLAIN’s residence. SANTIAGO did not immediately respond to the text message. Shortly thereafter, at 6:20 p.m., MOSS called SANTIAGO, and they had the following conversation:

SANTIAGO:	Yo?
MOSS:	Yo bro, where you, where you hide the shit at?
SANTIAGO:	Um, under the [U/I], under the jawn.
MOSS:	Nah that shit ain’t over there.
SANTIAGO:	That’s where the fuck it was, man. Check the plate, the plate cabinet jawn.
MOSS:	Yup, yup, I got it bro.

35. Based on training and experience, your affiant believes that this conversation between MOSS and SANTIAGO confirms the above, namely that that SANTIAGO hid drugs at CHAMBERLAIN’s residence and that MOSS subsequently sought to retrieve them but could not find them initially (“where you hide the shit at?”) until SANTIAGO directed him to the “plate cabinet,” at which point MOSS was able to find them.

36. MOSS has conversations with SANTIAGO about sharing drugs frequently. For example, on October 7, 2021, at 6:06 p.m., MOSS called SANTIAGO. The pertinent portion of that conversation follows:

[...]

MOSS: Bro, yo what you need? A zip or something?

SANTIAGO: I need 2 and a half.

MOSS: Aight, then you might as well take the zip I got, on me.

SANTIAGO: Aight, well I'ma get one of them.

[...]

SANTIAGO: Yo? oh shit. So I am about to get this, yo, I need you. I gotta grab 1 from you though.

MOSS: That's what I am saying, where the fuck you at?

SANTIAGO: I just pulled up the [U/I]

MOSS: Where you want me to pull up?

SANTIAGO: I told the ni**a at the [U/I] but I can say anything.

MOSS: I'll be there then, I am waiting. You said at the [U/I] I'll be here hurry up.

SANTIAGO: Aight.

37. Based on my training and experience, SANTIAGO is asking MOSS for “2 and a half” which refers to two and a half ounces of a controlled substance. MOSS advises SANTIAGO that he is in possession of one ounce, which is often referred to as an “oz,” “zipper,” or “zip” in coded drug language. MOSS and SANTIAGO agree to meet at a location to complete the exchange so SANTIAGO can complete the transaction he has set up (“I gotta grab 1 from you though”). It is common for drug dealers to meet at different locations at different times during the day to prevent law enforcement agents from locating their primary “stash houses.” This method also prevents law enforcement agents from identifying a pattern, which could more easily lead to the apprehension of the dealers. There is nothing in this conversation that clearly indicates to your affiant the type of drug MOSS and SANTIAGO are discussing.

38. On October 27, 2021 SANTIAGO and MOSS travelled together to Reading, Pennsylvania. Based on a subsequent call with RODRIGUEZ (described below), MOSS explained that during that trip to Reading, he purchased 10 pounds of crystal methamphetamine. On the morning of October 27, SANTIAGO and MOSS had an intercepted telephone conversation discussing purchasing/picking up a large quantity of drugs, later identified as crystal

methamphetamine. During the call, SANTIAGO referred to “the ni**as up top” being “ready,” which, based on your affiant’s training and experience, means that suppliers of drugs in a DTO are waiting to either receive money for a previous/future purchase of drugs or that an order of drugs are ready to be picked up. Based on this conversation, SANTIAGO appeared to be the individual who was directly in touch with the supplier.

39. On this same date at approximately 9:49 a.m., another telephone conversation was intercepted between SANTIAGO and MOSS, at which time it was confirmed that SANTIAGO was going to pick up MOSS at his residence. As a result, law enforcement sent surveillance units to this location in an effort to cover this meeting between SANTIAGO and MOSS.

40. Around approximately 10:00 a.m., surveillance observed SANTIAGO parked in front of MOSS’s residence in Newark, Delaware. A few minutes later, MOSS exited his residence and entered the passenger side SANTIAGO’s vehicle. The vehicle then left the area and drove toward Rt. 4. Surveillance followed the vehicle out of the neighborhood onto Rt. 4.

41. The vehicle was then followed along Rt. 4 towards Salem Church Road, Newark. The vehicle then turned on to Salem Church Road and proceeded to The Elms apartments. A short time later, the vehicle exited the Elms apartment complex onto Salem Church Road.

42. The vehicle was then followed onto Interstate 95 North and later entered into the City of Wilmington. The vehicle then travelled to the “East Side” of Wilmington. Mobile surveillance ultimately lost sight of SANTIAGO and MOSS in the area of East 9th Street/North Lombard Street, Wilmington. Despite surveillance losing sight of the two men, the DEA was able to continue to monitor MOSS’s location through E911 data received from his cellular telephone as part of the TIII wire intercept warrant authorized in this case. While doing so, DEA personnel

watched the coordinates of MOSS's cellular telephone as it traveled out of the area of Wilmington, Delaware directly to the area of Reading, Pennsylvania.

43. From approximately 1:00 p.m. through 3:00 p.m., MOSS's cellular telephone remained in the area of Reading, Pennsylvania before returning back to Delaware. Due to the physical surveillance of SANTIAGO and MOSS, I am aware that MOSS and SANTIAGO were together in the TARGET VEHICLE before travelling from Newark to Wilmington and eventually to Reading.

44. I believe that the trip to Reading, Pennsylvania was the trip "up top" that SANTIAGO was referring to and that the trip related to purchasing an additional quantity of drugs for distribution. SANTIAGO drove MOSS on this trip, utilizing his girlfriend's Ford Taurus.⁴ This conclusion is further supported by the fact that, less than a week later, MOSS told RODRIGUEZ (as discussed below) that the purpose of the trip to Reading, PA was to purchase 10 pounds of crystal methamphetamine.

45. A few days after the trip to Reading, on November 2, 2021, a conversation was intercepted between MOSS and SANTIAGO, regarding the distribution of controlled substances, likely the crystal methamphetamine that they purchased together. The pertinent part of the conversation is as follows:

SANTIAGO: Yo
MOSS: Ey bro.

⁴ I am aware that SANTIAGO also has a Cadillac SRX with an expired New Jersey registration tag. I am also aware that MOSS has a suspended driver's license. Based upon my training and experience, I believe that it was intentional that SANTIAGO picked up MOSS in his girlfriend's car, which is fully registered and lawful to operate on public roads, specifically because the purpose of SANTIAGO and MOSS's trip was for an unlawful objective. Drug dealers generally do not engage in illicit activities in vehicles which could be pulled over by police for administrative offenses such as improper registration, especially where, as here, SANTIAGO has access to another vehicle that is properly registered.

SANTIAGO: Yo.
 MOSS: Um where your shit at, you got four (4) jawns for this ni**a?
 SANTIAGO: Yeah, tell him um. It's in the microwave, in the fake microwave. I got four (4) if you want something, if you got...
 MOSS: Is your four (4) up here?
 SANTIAGO: Yes, there's four in there. It's one big jawn.
 MOSS: A'right.
 SANTIAGO: It's four (4) on the nose 'cause I had to weigh it out.
 MOSS: [U/I] for this [U/I] I know that much.
 SANTIAGO: Tell that ni**a, I need 12.

46. Based upon my training, experience, and knowledge of this investigation, I believe that this conversation related to the distribution of drugs, and specifically crystal methamphetamine. SANTIAGO references "four jawns" in a "fake microwave," which he states is "four on the nose 'cause I had to weigh it out." Based on this, it is clear that SANTIAGO had a quantity of drugs ready to be sold because it was already divided and weighed. SANTIAGO also states to MOSS to "tell that ni**a I need 12," which I believe is a reference to the fact that MOSS is completing the drug deal on SANTIAGO's behalf and that SANTIAGO wants \$1,200 in exchange for the four units of drugs that SANTIAGO weighed out. Based on the pricing and the reference to weighing "it out," I believe that SANTIAGO was referring to four ounces of his share of the crystal methamphetamine, which MOSS was distributing on for SANTIAGO to SANTIAGO's customer.

47. On November 27, 2021 MOSS had a call with SANTIAGO wherein they discussed SANTIAGO's acquisition of a pound of crystal methamphetamine and potentially sharing a heroin transaction for 300 bundles of heroin. The pertinent portion of that conversation follows:

MOSS: Yo.
 SANTIAGO: Yo, what you doing bro?
 MOSS: Shit, at the jects.
 SANTIAGO: I called your black ass.
 MOSS: Knocked the fuck out bro.
 SANTIAGO: Oh shit, I thought your phone was dead or something.

MOSS: I was dead.
SANTIAGO: Um nah, I was gonna say, somebody said Petey came over here right?
MOSS: Yeah.
SANTIAGO: So he gave me a pound of bud for free, well basically trying to pay the tab off.
MOSS: Yeah.
SANTIAGO: A pound of bud and he sold me a pound of ice for 2 grands.
MOSS: Hummm, that's right buddy.
SANTIAGO: But he got, but he got the line [U/I] I'mma just tell the ni**as, if we buy 20 [U/I] 10 of them for 1,500.
MOSS: Humm.
SANTIAGO: But the jawn I just grabbed [U/I] he's like, "Yo." He was like, [U/I] 20, you feel me?"
MOSS: Bro, can I get some, I need. Can I buy half?
SANTIAGO: What?
MOSS: [U/I] half the plate. [U/I] buy one (1)
SANTIAGO: I ain't gonna do that man.
MOSS: Come on man [U/I] fucking [U/I] man.
SANTIAGO: Damn, fuck that! [U/I]
MOSS: I got [U/I] tomorrow bro.
SANTIAGO: Yeah, another [U/I]
MOSS: [U/I] [Laughs] What the fuck you doing?
SANTIAGO: [Laughs] [U/I]
MOSS: Fucked up.
SANTIAGO: Like bro... [U/I]
MOSS: Can I buy, can I buy half?
SANTIAGO: I'm about to, I'm about to shoot out there. I gotta [U/I] I'm about to um...
MOSS: What? I need some Za bro.
SANTIAGO: Huh?
MOSS: Za bro.
SANTIAGO: Then I got, well, you wanna come get me?
MOSS: Fuck no bitch 'cause then I'm gonna have to take your black ass back out there tonight.
[...]
MOSS: Ey woah, woah, I gotta holla at Petey [U/I] well you gotta holla at him, shit to get some um jawns too.
SANTIAGO: Of what, the regular jawns?
MOSS: I need some uh grams [S/L]
SANTIAGO: Oh, oh, a'right. Yeah, probably I [U/I] bro.

MOSS: Look, look, my boy from down state, my boy from down state ready
To come up. We could split that trap if you want.

SANTIAGO: Uh.

MOSS: Probably like 300 Bs.

SANTIAGO: Of what, the regular shit? [U/I]

MOSS: Yeah.

SANTIAGO: Oh like last time? But when you gonna see, I don't know.
[Voices overlap]

MOSS: Let me put, hold on, hold on. [U/I] That's because we only got him.

SANTIAGO: Yeah. [Pause] I'm about to um...

MOSS: [U/I]

SANTIAGO: I'm about to uh, I gotta go out [U/I]

MOSS: A'right, pull up bro.

SANTIAGO: But uh...

MOSS: I'm over here.

SANTIAGO: I'mma call you.

MOSS: A'right.

48. Based on your affiant's training and experience, SANTIAGO is telling MOSS that he was recently given a pound of "bud" (marijuana) for free to "pay the tab off" (pay off a drug debt) and a pound of "ice" (crystal methamphetamine) for \$2,000. It appears that MOSS is running low on his own supply of crystal methamphetamine because he says "I need" and then asks to buy "half the plate" (half the pound) from SANTIAGO, to which SANTIAGO responds, "I ain't gonna do that man." MOSS then tells SANTIAGO he has a "boy from down state" (unknown associate from southern Delaware) who is bringing him a "trap" of "300 Bs." I am aware that a "trap" refers to a lined up drug deal, and "300 Bs" refers to 300 bundles of heroin. MOSS offers to split this heroin with SANTIAGO, at which time SANTIAGO asks if it is the "regular shit" (traditional heroin not laced with extra narcotics, like fentanyl, to increase its potency). When MOSS says "Yeah," SANTIAGO responds "Oh like last time?" Based on this statement, it appears that MOSS and SANTIAGO previously split a heroin sale to this customer.

Gerardo RODRIGUEZ's Connection to the MOSS DTO's Heroin Distribution

49. During this investigation, MOSS often worked and coordinated with RODRIGUEZ to obtain heroin for distribution. He spoke with RODRIGUEZ to facilitate a deal to purchase heroin and subsequent conversations made it clear that RODRIGUEZ stored heroin jointly with MOSS at CHAMBERLAIN's residence.

50. The day after interceptions began in this case, DEA agents intercepted communications between RODRIGUEZ and MOSS. On October 1, 2021, at approximately 3:32 p.m., RODRIGUEZ and MOSS exchanged several text messages, with RODRIGUEZ using phone number (302) 991-9791. Those text messages are below:

RODRIGUEZ:	I think bro gotta see you.
RODRIGUEZ:	And I think my boy too.
MOSS:	Aight gotchu nd ima have some paper for u to like 5.
RODRIGUEZ:	Ok sounds good bro bro.
MOSS:	Gotchu

51. Two days later, on October 3, 2021, from approximately 11:15 a.m. until approximately 6:03 p.m., RODRIGUEZ sent a series of unanswered text messages to MOSS:

RODRIGUEZ:	Yo bro
RODRIGUEZ:	Please try and get that paper to Mike need to send it up.
RODRIGUEZ:	Yo bro
RODRIGUEZ:	Bro I don't mean to bug but I told homie up top we were sending something up and he's waiting on me bro bro we're probably almost empty too.
RODRIGUEZ:	What's the look bro?

52. Based on training and experience, your affiant believes that MOSS is discussing paying RODRIGUEZ's drug supplier. Paper is a common street term for money. When MOSS says "ima have some paper for u to like 5," he is indicating that he has money for RODRIGUEZ to give to the source of supply in the amount of \$5,000.00 ("5"). In the next series of text messages from Oct 3, RODRIGUEZ continues to ask MOSS about sending money ("paper") to the drug supplier ("homie up top"). RODRIGUEZ also indicates that they are almost out of drug supply

(“we’re probably almost empty too”). Based on MOSS’s lack of response to RODRIGUEZ, your affiant believes that MOSS probably had not made back the total amount of gain/profit he should have yet in order to re-pay RODRIGUEZ’s source of supply. Therefore, MOSS avoided speaking with RODRIGUEZ on this date since he was not ready to settle his financial debt with said source of supply. This conversation is indicative that RODRIGUEZ and MOSS are involved in a conspiracy to distribute heroin which is supplied through RODRIGUEZ’s source of supply.

53. On October 31, 2021 beginning at approximately 3:45 p.m., MOSS had a text message conversation with RODRIGUEZ about the status of RODRIGUEZ’s source of supply.

The conversation was as follows:

MOSS:	Wats the word bro
RODRIGUEZ:	Just waiting on him bro
RODRIGUEZ:	Wyd
MOSS	Ok lmk trying to get some money

54. Based on my training and experience, your affiant believes that MOSS asked RODRIGUEZ if his heroin supplier was ready to see them yet (“Wats the word bro”) to make their next purchase. After RODRIGUEZ says he had not heard anything yet (“just waiting on him bro”), MOSS tells RODRIGUEZ he is still getting some money together to pay the source of supply.

55. The next day, November 1, 2021, at approximately 7:34 p.m., MOSS, again corresponded with RODRIGUEZ via text message about the status of his heroin source of supply.

The conversation was as follows:

MOSS:	U talk 2 him today bro
RODRIGUEZ:	He just hit me guess doing his thing
MOSS:	Ok lmk bro we drowning
RODRIGUEZ:	I know bro but we gonna be good
RODRIGUEZ:	My peoples from out my way said he’ll hit me soon too
RODRIGUEZ:	I been pushing bro
MOSS:	Lol I bet I got more paper to like another 2
RODRIGUEZ:	He’s on his way here to holla at me how far are u from Applebee’s

MOSS: I'm out the elms wat he bringing it to u
 RODRIGUEZ: I don't think so but he wants to holla at me for some thing
 MOSS: Oh ok

56. Based on training and experience, your affiant believes that MOSS again inquired about the status of RODRIGUEZ's heroin source of supply ("U talk 2 him today bro") since he clearly is either very low on heroin or completely out of heroin, since he indicates he is "drowning." Other messages during this time period that MOSS sent to drug customers looking to purchase product from MOSS indicated that MOSS was out of product and he was waiting to get more. In response, RODRIGUEZ tells MOSS that he did speak with the supplier and was meeting him later ("he's on his way here to holla at me"). RODRIGUEZ tells MOSS he does not believe the source of supply would bring heroin to the meeting (responding "I don't think so" to MOSS's inquiry "wat he bringing it to u"). MOSS also tells RODRIGUEZ that he has more "paper" (money) for him in the amount of "2" (\$2,000) for the drug purchase.

57. On November 3, 2021 at approximately 8:29 a.m., MOSS, had a telephone conversation with RODRIGUEZ to discuss traveling to Philadelphia, Pennsylvania to pick up their heroin shipment from RODRIGUEZ's source of supply. The pertinent details of this discussion are as follows:

MOSS: Yo bro.
 RODRIGUEZ: What's going on man?
 MOSS: Yo.
 RODRIGUEZ: Yo um, he hit me up yesterday. He said he's gonna let us know today. He said definitely today, he's gonna call me at like 12 or 1 o'clock and tell me at what time to be out there.
 MOSS: I'm [U/I]
 RODRIGUEZ: Yeah, fucking... I'm like you man fucking grounded man.
 MOSS: [Laughs] It's killing you and me bro.
 RODRIGUEZ: Bro, you already know 'cause look...[U/I]
 [Voices overlap]
 MOSS: [U/I]
 RODRIGUEZ: Huh?
 MOSS: You know what I've been doing? I've been fucking, I had

like uh... 20 grams, some, some uh shit left, right.
 RODRIGUEZ: Yeah.
 MOSS: I've been dragging that shit up by the grams straight roll.
 [...]

58. Based on training and experience, your affiant believes that RODRIGUEZ is advising MOSS that the supplier will call that afternoon (“at like 12 or 1 ‘o clock”) to let him know what time he wants to meet in Philadelphia, Pennsylvania (“out there”). Based on previous interceptions, your affiant is aware that RODRIGUEZ’s supplier is in Philadelphia. MOSS and RODRIGUEZ then go on to discuss how they need to meet with the source of supply soon because they are “grounded man” (have been struggling with very little product on hand to sell). MOSS tells RODRIGUEZ that he had only “20 grams...left” (meaning a very small quantity left).

59. On November 4, 2021, MOSS and RODRIGUEZ engaged in several conversations throughout the day in reference to taking a trip to Philadelphia to meet with RODRIGUEZ’s heroin source of supply. After numerous text message and telephone calls, the decision was made for MOSS to drive with RODRIGUEZ to meet the source of supply (Session 11868). The conversation, which occurred at approximately 9:04 p.m., is as follows:

MOSS: Yo?
 RODRIGUEZ: Yo, bro. Bro, you wanna pick me up in my, at the telly?
 MOSS: Hum..I don’t care. I gotchu.
 RODRIGUEZ: It’s up to you, you want me to come there? or
 MOSS: [Clears throat] Yeah, come here, Snap and we don’t have to worry about the cops and shit, all that weird shit.
 RODRIGUEZ: Aight. Aight.

60. Based on training and experience, your affiant believes that this conversation indicates that RODRIGUEZ ultimately agreed that MOSS would drive to Philadelphia after he picked up RODRIGUEZ from the “telly” (hotel). MOSS then directs RODRIGUEZ (“Snap”) to come to his residence and they can leave from there together as a unit. It is normal procedure for participants in a drug trafficking organization to drive in pairs when going to pick up product from

a source of supply. MOSS then says “we don’t have to worry about the cops and shit,” indicating that the purpose of their trip is illegal and running into the police would be problematic.

61. Surveillance followed MOSS and RODRIGUEZ while driving in MOSS’s Challenger to Philadelphia. Upon arrival, MOSS drove his vehicle to the parking lot of the AutoZone (by Hunting Park in Northeast Philadelphia), and around to the back of the building, despite the fact that the store had long since closed for the evening. Surveillance units could not follow MOSS’s vehicle into this location without a strong possibility of being detected, so they waited on the other side of the building. After approximately one or two minutes, the vehicle exited the AutoZone parking lot and drove directly back to Delaware. Based on my training and experience, the intercepted calls, and the short duration of a trip to the rear of a closed business in Philadelphia was to purchase a bulk quantity of heroin. Your affiant is also aware that after this trip, MOSS no longer told drug customers who contacted him that he was out of product.

62. On November 5, 2021, the next day, at approximately 7:36 p.m., MOSS and RODRIGUEZ engaged in a text message conversation discussing the heroin they had purchased the night before. The pertinent portion of the conversation follows:

RODRIGUEZ:	Your there now?
MOSS:	Nah I left but I left the shit there for Mikey wit tina

63. Based on training and experience, MOSS is telling RODRIGUEZ that he is not at 1305 Coventry, but that he left the heroin (“shit”) for “Mikey” (known drug associate of RODRIGUEZ, Michael Honie) to pick up from CHAMBERLAIN (“Tina”).

64. On November 3, 2021 at approximately 8:36 a.m., MOSS, received a telephone call from RODRIGUEZ at which time they spoke about RODRIGUEZ’s heroin source of supply. During the course of this conversation, MOSS told RODRIGUEZ about a trip he and SANTIAGO

made to Reading, Pennsylvania to purchase a bulk quantity of crystal methamphetamine. The pertinent portion of that conversation is as follows:

[...]
 MOSS: Yo, what about those ni**as, in Reading bro, Reading Pa?
 RODRIGUEZ: Yeah, I got a bunch of people out there.
 MOSS: Bro, that's where the ice is, bro, I don't know if you know that.
 RODRIGUEZ: I swear to God.
 MOSS: Ni**a, look, listen.
 RODRIGUEZ: That shit is in Kenneth, bro.
 MOSS: Bro, listen, I promise you on my mom, bro, I just went up there, right? And I went and saw the house with nothing but Dominicans and Mexicans, bro, these motherfuckers had the steel door, the motherfucking camera set up, bro, it was a garage that looked like a house.
 RODRIGUEZ: Hum...
 MOSS: But, it's a fucking trap bro. You hear me?
 RODRIGUEZ: Yeah.
 MOSS: And no bullshit, we bought 10 pounds of ice, off these ni**as, bro. They got it, bro, I promise you, they all, and look, my boys all down there hustling right now, you feel me?
 RODRIGUEZ: Yeah.
 MOSS: But, one of them is like a millionaire, though, bro.
 RODRIGUEZ: Yeah. See..
 MOSS: What I'm telling you is, what I'm telling you is bro [U/I]
 [Voices Overlap]
 RODRIGUEZ: Bulky.
 MOSS: Huh?
 RODRIGUEZ: That shit is too bulky.
 MOSS: It is, but, bro, bro, swear to you, it's like, a dope flip bro, you ain't gonna lose, I swear you not, ain't no motherfucking way, you can lose, bro, you hear me?

65. Based on training and experience, your affiant believes MOSS discloses to RODRIGUEZ that he made a trip to Reading and purchased ten pounds of crystal methamphetamine ("ice" is a common street term for crystal methamphetamine). MOSS then proceeds to tell RODRIGUEZ that the individuals who he met with to purchase the crystal

methamphetamine were Dominicans and Mexicans who met him at a garage that looked like a house outfitted with cameras and a steel door. The description MOSS provides is consistent with a “stash house,” which often has surveillance equipment, like cameras, and security features, like steel doors. MOSS tells RODRIGUEZ that crystal methamphetamine is easy to sell and he “ain’t gonna lose” (lose money) if he starts distributing it. RODRIGUEZ voices a concern to MOSS that the crystal methamphetamine is “bulky” (its physical appearance), however MOSS reassures him it is easy sell, calling it as easy as a “dope flip,” meaning the purchase and subsequent resale

66. Beginning around mid-to-late November, MOSS and RODRIGUEZ’s relationship began to sour. RODRIGUEZ began storing his share of the heroin he purchased with MOSS at the Elms Apartment complex with CHAMBERLAIN, alongside MOSS’s heroin. Eventually RODRIGUEZ began to believe that CHAMBERLAIN stole 5 sticks⁵ of heroin he was storing at CHAMBERLAIN’s apartment and he confronted CHAMBERLAIN and MOSS about it. Those discussions further revealed the scope of MOSS and RODRIGUEZ’s heroin operations.

67. On November 20, 2021 at approximately 1:46 p.m., RODRIGUEZ began sending text messages to MOSS about the situation. The relevant text messages follow:

RODRIGUEZ:	Bro I’m ready to air out Tina crib bro.
RODRIGUEZ:	That loss sunk me
RODRIGUEZ:	I should have took my shit somewhere else
MOSS:	Bro idk I asked her she said she ain’t take shit bc she new it was urs ND my shit was separate from ur shit
RODRIGUEZ:	Bro she’s had it there for a couple weeks. If u believe her over me it’s cool
MOSS:	Bro I’m not believing nobody all I’m saying is wat the bitch said when I confronted her
MOSS:	ND I never had them steal all that shit from me
RODRIGUEZ:	Of course she not gonna say she stole it but like you said you didn’t grab anything but she says you did

⁵ As stated earlier, a “stick” or a “log” of heroin is typically 10 bundles of heroin sold together. A “bundle” is 13 individual heroin baggies.

MOSS: I grabbed one stick I told both yall that bc it was out of the 2 u owed me from selling the ones I paid for to the boy in the city so we could grab faster

68. After the last message from MOSS, RODRIGUEZ called MOSS. They had a long conversation that continued on the same topic. A relevant portion of the conversation is as follows:

MOSS: Yo.
RODRIGUEZ: Yo. Bro, I told you, I told you in the beginning, remember that one day I went in the house and you was like, "Yo, you stole the two (2) and I looked at you?"
MOSS: Yeah.
RODRIGUEZ: She had already taken them shits bro.
MOSS: That's not, she never even knew you owed me two to even take them, that's what I'm saying.
RODRIGUEZ: No, she's...
[Voices overlap]
MOSS: There's no way she could have took them. I never told her to take them.

[...]
RODRIGUEZ: Bro, yeah, I know that but when I went in the crib, she goes, "Yo, I grabbed these jawns out of your bag because Bleek didn't have any more so I went into yours and grabbed them for him."
MOSS: Yeah, but that was only one stick. I told her to do that. I'm the one who was right there when she did it. It was only one stick and then she left one in there. She's like, "Yo, it's three and a half in that jawn."
[Voices overlap]
[...]
RODRIGUEZ: Yeah, so you gotta take two off so the number is five (5) sticks missing. You know what I'm saying? Like I don't give a fuck [U/I]
[Voices overlap]
MOSS: [Clears throat]
RODRIGUEZ: ... bro, the numbers is the same, me and you have never had an issue.
MOSS: I know, that's what I'm saying. I, I, specifically didn't touch them. You wanna know why? Because you was coming there constantly. You feel me? I didn't even know what the fuck we got. You feel what I'm saying? [U/I]
[Voices overlap]
RODRIGUEZ: [U/I]

MOSS: Due to the fact that you was coming there as much as you was, I said, "You know what? I ain't gonna touch shits, I got my own, right here. I'm not gonna touch them..."

[...]

RODRIGUEZ: [U/I] and she grabbed it bro. If you put me face to face with Tina bro, and I'm gonna say to Tina, "Didn't you tell me that you offed the work while Bleek was gone and then you told me you didn't have no more so you grabbed one (1) but Bleek never replaced it and she [U/I] said yeah but between me and you, I owed you two (2).

MOSS: Bro.

RODRIGUEZ: She said that she grabbed it and you're gonna replace it. I never mentioned you [U/I]

[Voices overlap]

MOSS: But she never, she only took one (1) tho' bro. She ain't take two (2)

RODRIGUEZ: Yeah but that's what she's saying. I don't care what she's saying bro. I'll send a fucking dude in her crib bro, like she, I'm not, I'm not playing. I'm not gonna, I'm not playing with her like, if, if them shits don't show up bro, I'm sending someone in her crib like I'm not, I'm not asking, I'm not playing, ain't no, ain't no...

MOSS: Bro, I don't even give a fuck, I don't even know why you're telling me.

RODRIGUEZ: No, 'cause it's your fucking [U/I] bro.

[Voices overlap]

MOSS: I feel like now, it feels like, it's like you talking about like you like, you talking about [U/I] asking, you like, you saying it to me like, I'm not saying that you gotta ask me to run in no mother fucking crib. If you're gonna run in the crib, then do it, you feel what I'm saying?

RODRIGUEZ: Yeah. Nah [U/I]

[Voices overlap]

MOSS: But at the end of the day, it's like...

RODRIGUEZ: But you was the only one touching it bro!

[Voices overlap]

MOSS: Come on, every time you went there, every time you went there bro, you at least took 40 to 50 Bs, every time, every time.

[...]

MOSS: Every time she went in the bag, when I was there... it was when you was like, "Yo, uh, I need this." And then I'm like, "Yo, Tina, grab that for him."

RODRIGUEZ: Yeah but, [U/I]

[Voices overlap]

MOSS: That be the only time.

RODRIGUEZ: Bro, this what I'm saying bro. This what I'm saying bro, the whole pack is in her crib. She got access to it 24/7. She don't gotta tell nobody dick.

MOSS: I know that, I know that.

RODRIGUEZ: [U/I] camera on her.

MOSS: I'm not saying that. I'm not even saying the bitch didn't do it but it's like, I don't know. I don't know.

RODRIGUEZ: It's like, I gave it to you to trust you to fucking put it over there. What am I gonna tell him, "I gave it to you, you gave it to someone else?"

MOSS: But my shit bro, I all, my shit been there every time tho'.

RODRIGUEZ: Yeah, yours did.

[Voices overlap]

MOSS: An, and, listen, when it's just me touching it, bro, it never happened. You feel me? Never. Like I never, I don't have no problems, I don't really be having no type problems with them bitches. Them bitches bro, I'm telling you bro, I be having way more shit than that bro, over there and them bitches don't really be stealing bro, like they could have been stealing, stealing, you feel me bro?

[...]

RODRIGUEZ: But I swear to you, I swear on my kids bro. I went there the first, the first time, she didn't get shit because it was just me and you. The second time I went, it was me by myself and I just grabbed five (5).

MOSS: Yeah.

RODRIGUEZ: But when I grabbed them five (5), she was like, "Listen, Bleek ran out of his jawns, I grabbed one of yours to start pushing them.

MOSS: Yeah.

RODRIGUEZ: And then in my mind I'm like, "Alright, cool, I owe him two" so she grabbed one. I'm not gonna tell her what I owe you and what me and you got going.

MOSS: Right, right, right. I never even told that bitch either.

[Voices overlap]

RODRIGUEZ: [U/I] Yeah.

MOSS: That's why I said, I said, "Yo, just give him one out of yours for me."

RODRIGUEZ: Yeah.

MOSS: But I know, I'm like, "A'right, I know Snapper already know about this." You feel me? We had already talked about this so I already know what the fuck it was, you feel me?

RODRIGUEZ: So then, I went back again and I grabbed, I grabbed five (5) and then the day I took the four (4) and a half, I knew she was on some shit. I swear bro, I knew she was on some shit 'cause she didn't really want to handle or move it. She was like, hesitant.

MOSS: Yeah.

RODRIGUEZ: And then, when I went and grabbed the last two, I already knew she was fucked up tho', the look in her eyes. I already knew, man.

MOSS: That was weird.

RODRIGUEZ: But I told you, I told you she fucked up. You take, you take...

MOSS: Nah, I know, I know, I know for sure. I already know for sure bro.

[Voices overlap]

RODRIGUEZ: [U/I]

MOSS: But I had, that's why, listen bro, I already, even when you first told me that, I've been stepping back from that shit and paying attention like, hold on, mother fucking, let me see. I was [U/I] pull out anything, ever since you told me that. You feel me?

[...]

RODRIGUEZ: That whole little flip, that whole little flip, I didn't make nothing.

MOSS: [U/I]

RODRIGUEZ: 300 bundles and I didn't get nothing bro. Tsk!!

69. Based on training and experience and knowledge of this investigation, the prior conversations between RODRIGUEZ (referred to by his nickname, "Snapper") and MOSS (referred to by his nickname, "Bleek") refer to the fact that RODRIGUEZ believes that CHAMBERLAIN ("Tina") stole 5 sticks (or roughly 50 bundles) of heroin from him. MOSS says that he only ever directed CHAMBERLAIN to take 1 stick of RODRIGUEZ's heroin ("that was only one stick. I told her to do that") due to RODRIGUEZ owing MOSS two sticks of heroin as a debt, but that CHAMBERLAIN was never aware of the debt ("she never even knew you owed me two to even take them"). RODRIGUEZ agreed that he owed MOSS two sticks of heroin, but also said he never mentioned it to CHAMBERLAIN because it wasn't CHAMBERLAIN's business how MOSS and RODRIGUEZ agreed to divide the drugs (I'm not gonna tell her what I owe you and what me and you got going.")

70. At one point, RODRIGUEZ threatened violence upon CHAMBERLAIN, telling MOSS that he was going to "send a fucking dude in her crib bro...if, if them shits don't show up bro." He told MOSS that he was not asking for permission either: "I'm not asking, I'm not playing[.]" RODRIGUEZ also alleged that MOSS was the only one who accessed the heroin they

had stored at CHAMBERLAIN's ("But you was the only one touching it bro!"). In response, MOSS made it clear that RODRIGUEZ was taking up to 40 or 50 bundles of heroin every time he came to CHAMBERLAIN's apartment ("Come on, every time you went there, every time you went there bro, you at least took 40 to 50 Bs, every time, every time.") During the conversation, RODRIGUEZ made the full extent of his drug conspiracy with MOSS clear, stating that this tranche of heroin they bought and stored together at CHAMBERLAIN's ended up netting RODRIGUEZ no profit despite having 300 bundles of heroin to sell ("That whole little flip, that whole little flip, I didn't make nothing...300 bundles and I didn't get nothing bro. Tsk!!").

71. After the conversation with RODRIGUEZ, MOSS spoke with CHAMBERLAIN and discussed the conversation with RODRIGUEZ. In relevant part the conversation follows:

CHAMBERLAIN:	We still got, I think, like 6 bundles.
MOSS:	A'right. I got some of that shit too.
CHAMBERLAIN:	So.
MOSS:	I got, I got more. [Pause] You hear me?
[...]	
CHAMBERLAIN:	And I got money here for you.
MOSS:	A'right, I got you.
CHAMBERLAIN: Okay?	You good tho'? You okay?
MOSS:	Yeah, I'm chilling. [Clears throat] Just some in, in town bullshit.
[...]	
MOSS:	Uh-uh uh -uh. I just got, I just got into a fucking, I just got into an argument with this ni**a Snapper, you hear me? [Pause] You hear me?
CHAMBERLAIN:	Over that shit?
MOSS:	Yeah. I had to like, the ni**a was talking all this dumb shit, yeah. Started talking stupid bro, I had to come at him like, "Yo bro, stop fucking. " Like for real, for real bro. What you trying to say? Who you coming at? Like [U/I] I'm lost here.
CHAMBERLAIN:	Like he talking [U/I] or..?
MOSS:	And that ni**a, that ni**a is straight. He talking about. He talking about [Clears throat] that "you grabbed out one stick from me before I even told you to grab it the stick." I'm like, "No the fuck I didn't. Bro, no, she didn't dawg. I

know the fuck she did.” Ni**a, you came here about six times for 5 Bs ni**a. For real.

CHAMBERLAIN: For five sticks! He was coming, grabbing sticks, not Bs.

MOSS: That’s what I meant to say, Bean, I meant to say sticks. You know I meant to say sticks.

CHAMBERLAIN: Yeah, yeah... yeah!

CHAMBERLAIN: Like I might [U/I] and I might [U/I] like I, I don’t, I did not, dude, that’s, we’re talking 50 bundles. 50 bundles.

MOSS: That’s what I’m saying, that’s what I’m saying. He like, “Bro, [U/I] 11 bags in one shot. I’m like, [U/I]

[Voices overlap]

CHAMBERLAIN: [U/I] I’m gonna get you and extra 100 dollars.

MOSS: I know.

CHAMBERLAIN: I’m here stressing over 100 fucking dollars, to make sure all the money is right, to make sure all the dope is adding up because of all the extra dope people are being hooked up with ... and...

MOSS: Yeah, fuck that shit.

[...]

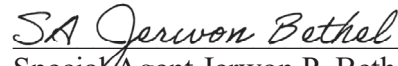
72. Based on training and experience and knowledge of this investigation, the conversation between MOSS and CHAMBERLAIN further corroborates the joint heroin distribution of MOSS, RODRIGUEZ, and CHAMBERLAIN. The conversation begins with CHAMBERLAIN advising MOSS that they are down to only 6 bundles left of heroin and MOSS tells CHAMBERLAIN that he was able to obtain more to replenish the supply (“I got, I got more.”) During the conversation MOSS tells CHAMBERLAIN about the dispute with RODRIGUEZ (“Snapper”) and again repeats the statement that RODRIGUEZ came to pick up his heroin from CHAMBERLAIN’s apartment on 6 prior occasions, picking up 5 sticks (i.e. 50 bundles) every time (“you came here about six times for 5Bs ni**a ... I meant to say sticks”) meaning that RODRIGUEZ would have picked up all 300 bundles that were his to distribute and 50 were not stolen by CHAMBERLAIN. CHAMBERLAIN then reiterates that she is worried about small things, like a \$100 owed to MOSS (“I’m here stressing over 100 fucking dollars”), when

RODRIGUEZ is responsible for losing 50 bundles of heroin, which in my training and experience is thousands of dollars' worth of heroin.


CONCLUSION

WHEREFORE, based on the foregoing, I submit that there is probable cause to believe that defendants MOSS, SANTIAGO, RODRIGUEZ, and CHAMBERLAIN violated 21 U.S.C. §§ 841(a)(1), (b)(1)(C), & 846 by engaging in a conspiracy to distribute heroin and methamphetamine from at least October 1, 2021 until December 9, 2021, and therefore I respectfully request that the Court issue a criminal complaint charging them with that offense.

Respectfully submitted,


Special Agent Jerwon P. Bethel
Drug Enforcement Administration

Sworn to telephonically in accordance with Fed. R. Crim. P. 4.1 before me this 13th day of December, 2021


The Honorable Sherry R. Fallon
United States Magistrate Judge